MANDATORY DISCLOSURES

Under the Uniform Guidance (200.113, shown below), the University of Minnesota is obligated to disclose to the Federal awarding agency (or a pass-through entity if we are a subrecipient), any violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Examples of such a situation might be when a project employee is caught stealing funding from the award, or when a bribe has been offered to a federal official to obtain preferential treatment about making an award.

§200.113 Mandatory Disclosures

The non-Federal entity or applicant for a Federal award must disclose, in a timely manner, in writing to the Federal awarding agency or pass-through entity all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal award. Failure to make required disclosures can result in any of the remedies described in §200.338 Remedies for noncompliance, including suspension or debarment. (See also 2 CFR part 180 and 31 U.S.C. 3321).

While such a violation occurs only very rarely, if you become aware of such a violation (or a potential violation), please notify three individuals:  Sue Paulson (Assistant Controller), Sarah Waldemar (Director, REO), and Pamela Webb (Associate VP, Research Administration).  We will make sure both that any required disclosure is made, and that others in the University, such as General Counsel and Internal Audit, are aware of the situation if they are not already.

While the rule technically applies to federal awards only, we would like to be aware of this kind of issue on any sponsored project, regardless of fund source.